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Attorney for Defendant MAGGIE SIEBEN

**UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF CALIFORNIA  
 (HON. ROGER BENITEZ)**

UNITED STATES OF AMERICA,	)	Case No. 08-CR-0511-4-BEN
	)	
Plaintiff,	)	NOTICE OF MOTION AND MOTION
	)	FOR DISCOVERY; TO DECLARE
v.	)	CASE COMPLEX; AND FOR LEAVE
	)	TO JOIN MOTIONS FILED BY
MAGGIE SIEBEN,	)	OTHER COUNSEL; AND FOR
	)	LEAVE TO FILE FURTHER
Defendant.	)	MOTIONS
_____	)	
		DATE:
		TIME:
		DEPT:

TO: PLAINTIFF UNITED STATES OF AMERICA AND ITS ATTORNEY OF  
 RECORD, KAREN P. HEWITT, UNITED STATES ATTORNEY FOR THE SOUTHERN  
 DISTRICT OF CALIFORNIA; AND ASSISTANT U.S. ATTORNEY TIMOTHY F.  
 SALEL.

Please take notice that at the above designated time and place, defendant Maggie  
 Sieben will move the court for an order compelling discovery in the instant case with respect  
 to the items set forth in the attached memorandum of law, based upon the constitutional,  
 statutory, and judicial authorities cited herein. Defense counsel will further move the court to  
 have case declared complex and for leave to join the motions filed in this matter by other  
 counsel unless specifically exempted therefrom, and for leave to file further motions.

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1 Said motion is based upon the instant notice of motion, the attached memorandum of  
2 law, and on such evidence and argument as may be presented at the hearing on the motion.

3  
4 Date: April 7, 2008

Respectfully submitted,

5  
6 /s/ Paul W. Blake  
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